

CHRISTENSEN JAMES & MARTIN

Evan L. James, Esq. (7760)

Laura J. Wolff, Esq. (6869)

7440 W. Sahara Avenue

Las Vegas, Nevada 89117

Telephone: (702) 255-1718

Facsimile: (702) 255-0871

Email: elj@cjmlv.com, ljw@cjmlv.com

*Attorneys for California Ironworkers Field Pension Trust,**California Ironworkers Field Welfare Trust, California and**Vicinity Field Ironworkers Annuity Fund, California Field**Ironworkers Vacation Trust Fund, California Field Ironworkers**Apprenticeship Training and Journeyman Retraining Fund,**Ironworkers Workers' Compensation Trust, California Field**Ironworkers Administrative Trust, and California**Field Ironworkers Labor Management Cooperative Trust***UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

The Trustees of the California
Ironworkers Field Pension Trust,
California Ironworkers Field Welfare
Trust, California and Vicinity Field
Ironworkers Annuity Fund, California
Field Ironworkers Vacation Trust Fund,
California Field Ironworkers
Apprenticeship Training and Journeyman
Retraining Fund, Ironworkers Workers'
Compensation Trust, California Field
Ironworkers Administrative Trust, and
California Field Ironworkers Labor
Management Cooperative Trust,

Plaintiffs,

vs.

Freyssinet, Inc., a Delaware corporation;
Western Surety Company, a South
Dakota Company; M. A. Mortenson
Company, a Minnesota corporation;

Case No.: 2:20-cv-01519-RFB-EJY

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANTS
FREYSSINET, INC. AND WESTERN
SURETY COMPANY TO RESPOND TO
THE COMPLAINT**

(SECOND REQUEST)

1 McCarthy Building Companies, Inc., a
 2 Missouri corporation; Federal Insurance
 3 Company, an Illinois corporation; and
 4 Mortenson-McCarthy Las Vegas
 5 Stadium, a Joint Venture, a general
 6 partnership; Merchants Bonding
 7 Company, an Iowa Company; Travelers
 8 Casualty and Surety Company of
 9 America, a Connecticut surety; John Does
 10 I-XX, inclusive; and Roe Entities I-XX,
 11 inclusive,

12 Defendants.

13 WHEREAS, on October 26, 2020, this Court signed an Order [Doc. 10]
 14 extending Defendants Freyssinet, Inc. (“Freyssinet”) and Western Surety
 15 Company’s (“Western”) time to respond to the Complaint up to and including
 16 December 6, 2020;

17 WHEREAS, the Plaintiffs, Freyssinet and Western have agreed to extend the
 18 time again, up to and including December 18, 2020;

19 WHEREAS, the parties are actively engaged in settlement discussions;

20 WHEREAS, Plaintiffs and Freyssinet have agreed that extending the due date
 21 for Freyssinet’s and Western’s respective responsive pleadings will allow time for
 22 the parties to further engage in meaningful settlement discussions that could resolve
 23 the case or reduce the scope of the issues in dispute;

24 WHEREFORE, IT IS HEREBY STIPULATED by Plaintiffs and Freyssinet,
 25 by and through their undersigned counsel of record, that pursuant to LR IA 6.1, that
 26 Freyssinet and Western shall have up to and including December 18, 2020 within
 27 which to answer or otherwise respond to the Complaint.

///

///

///

1 This is the second stipulation to extend time by which Freyssinet and
2 Western Surety must respond to the complaint.

3 Dated this 4th day of December, 2020.

4 CHRISTENSEN JAMES & MARTIN

COZEN O'CONNOR

5 By: /s/ Laura J. Wolff
6 Laura J. Wolff, Esq. (6869)
7 Evan L. James, Esq. (7760)
8 7440 W. Sahara Avenue
9 Las Vegas, Nevada 89117
10 Tel: (702) 255-1718
11 Fax: (702) 255-0871
12 Email: ljw@cjmlv.com;
13 elj@cjmlv.com
14 *Attorneys for Plaintiffs*

By: /s/ Michael W. Melendez
Michael W. Melendez, Esq. (6741)
3753 Howard Hughes Parkway, Suite 200
Las Vegas, NV 89169
Tel: (415) 593-9610
Fax: (415) 692-3688
Email: mmelendez@cozen.com
Attorneys for Defendant Freyssinet, Inc.

15 IT IS SO ORDERED:

16 
17 UNITED STATES MAGISTRATE JUDGE

18 Dated: December 4, 2020
19
20
21
22
23
24
25
26
27